

ALLTEL Communications, Inc.
E-911
Eighth Quarterly Report
August 3, 2004¹
CC Docket No. 94-102

Introduction

ALLTEL Communications, Inc. (“ACI” or “ALLTEL”) is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission’s Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) (“Stay Order”). ACI has chosen an AGPS handset-based location technology to comply with the Phase II E-911 requirements. Under the terms of the Stay Order, ACI was required by May 31, 2003, to ensure that at least 25% of all new handsets activated were location capable; 50% by November 30, 2003; and 100% by May 31, 2004. It is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. As previously reported, ALLTEL has exceeded its handset deployment threshold, and is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs. The instant report is submitted pursuant to paras. 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto.

ACI has continued to actively engage the PSAPs within its market areas to ensure timely activation of both Phase I and Phase II E-911 services as early as possible given the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission’s deadlines for Phase II E-911 under the Stay Order.

¹ ALLTEL experienced last-minute difficulties in compiling the underlying data for the instant report and was unable to timely file accurate information by yesterday’s August 2, 2004 due date. Given the short delay and the importance of ensuring the accuracy of the information submitted, ALLTEL respectfully submits that a minimal waiver of the filing deadline to accommodate the instant filing is consistent with the public interest pursuant to Sections 1.3 and 1.925 of the rules. *See* 16 FCC Rcd 20159 (Com. Car. Bur. 2001) (granting 1-month extension of reporting date to ensure accuracy of data submitted); 15 FCC Rcd 15001 (Com. Car. Bur. 2000) (granting 3-month extension due in part to “significant, and unanticipated, additional work” necessary to complete report).

Discussion

I. Phase II AGPS Network Deployments

No new developments to report. As previously reported, ALLTEL has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and redundant trunking between the units has been implemented. ALLTEL has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. ACI is engaged in such testing with capable PSAPs prior to cutting to live service.

II. Handset Deployment

The Stay Order requires that ACI, as a Tier II carrier, reach a 25% deployment threshold for ALI-capable handsets as a percentage of all new handsets sold by May 31, 2003, 50% by November 1, 2003, and 100% by May 31, 2004. As previously reported, ALLTEL began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 in compliance with this requirement and well in advance of the required March 1, 2003 date. It exceeded the May 31, 2003 handset deployment threshold (25% of new activations) with AGPS equipped handsets comprising approximately 30.3% of new handset activations as of that date. It also exceeded the November 1, 2003 threshold (50% of new activations) with AGPS equipped handsets comprising approximately 98% of new handset activations as of that date. Finally, preliminary indications are that ALLTEL has met the May 1, 2004 threshold requirement that 100% of all new digital handset activations must be ALI-capable.

The following is a summary list of AGPS enabled handsets distributed by ALLTEL and their launch dates:

Audiovox 9155	6/30/02
Kyocera 2325	10/4/02
Motorola 120e	10/10/02
Kyocera 7135	11/02
Toshiba CDM9500	11/02
Kyocera 3225	3/03
Motorola T720	2/03
Nokia 3585I	7/03
Motorola V60x	9/03
LG 5450	12/03
Kyocera 3250	1/04
Audiovox 8410	1/04

III. Accuracy Requirements and Methodology

ACI's extensive testing and evaluation processes were previously reported and detailed in its earlier Quarterly Reports. ACI has transitioned from testing and evaluation of its AGPS solution, which ACI believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response to valid PSAP requests. ACI has contracted with TechnoCom to develop procedures and provide assistance to establish proper techniques to configure each cell site and sector as well as to ensure accurate delivery of Phase II location information to capable PSAPs. ACI and TechnoCom are working closely with individual capable PSAPs to further test and refine the accuracy and reliability of its solution, taking into account the particulars of each individual PSAP's network and capabilities. In all markets in which PSAPs have requested service ACI is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, ACI continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV. Deployment Issues

As previously reported, ACI has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. ACI's experience continues to be that, in most markets, problems can continue to be resolved in time for timely or mutually agreed-to deployment of Phase II to PSAPs.

Regarding systems ACI has acquired through acquisition, particularly CenturyTel's TDMA network, ALLTEL continues to overlay and convert these TDMA systems to CDMA, and consequently, its handset based E-911 Phase II solution, in order to provide Phase II service in response to valid PSAP requests. ALLTEL continues to work hand-in-hand with the PSAPs in these markets to ensure timely deployment according to the negotiated dates.

V. Status of Phase I and Phase II Deployment Efforts.

ACI continues to strive for early E-911 deployment. Additional markets are moving toward live Phase II deployment rapidly. Detailed spreadsheets on both Phase I and Phase II deployment schedules are attached to this filing. ALLTEL would be pleased to provide the Commission with such additional information as it may require.

A. Phase I

ALLTEL has deployed Phase I service in response to over 650 PSAP requests. ALLTEL has approximately 76 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached

spreadsheets.

B. Phase II

To date ALLTEL has received well over 300 Phase II requests. Of this number, over 250 requests have been met and service has been cut-live, while approximately 80 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets.

C. General Condition

As previously reported, technology issues for ACI's multi-vendor network have largely been resolved, and ALLTEL continues to work aggressively on a PSAP-by-PSAP basis. While some minor delays will result in Phase II service in some markets, ACI has taken all the steps not dependent on PSAP readiness: it has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. *Order on Reconsideration*, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed below, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. ALLTEL continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that ACI will encounter unforeseen delay in implementation and consequently may need to seek specific and limited relief from deployment deadlines. ACI's good faith efforts warrant Commission flexibility as ACI works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.²

ACI would be pleased to provide the Commission with such additional information as it may require.

² As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

Declaration

I have read the foregoing E-911 Eighth Quarterly Report of ALLTEL Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed August 3, 2004.

/s/

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CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 3rd day of August, 2004, I caused copies of the foregoing "Eighth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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